EXHIBIT A

LAW OFFICES
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pr.06

June 13, 2005

J. Michael McMahon Clerk of Court Daniel Patrick Moynihan United states Courthouse 500 Pearl Street New York, NY 10007-1312

> RE: In Re Terrorist Attacks of September 11, 2001 03 MDL 1570 (RCC) Estate of John P. O'Neill et al. v. Republic of Iraq et al. 04-CV-1076-(RCC) MDL 1570

Dear Mr. McMahon:

This is to request that you serve Foreign Sovereign Defendants pursuant to the Foreign Sovereign Immunities Act, 28 USC § 1608 (a) (4). I have been advised by the State Department, Division of Consular Affairs that service under (a) (1)-(3) would be futile in this case as the government of Iran will not accept service from a U.S. citizen and the government of Iraq has not established a Foreign Ministry to accept service from U.S. citizens. Therefore, I am requesting that you proceed by serving the State Department with the enclosed documents so that they may perfect service under (a) (4).

The defendants to be served are as follows:

- 1. Ali Fallahian, Iranian Minister of Intelligence and Security;
- 2. Ayatollah Ali Hoseini-Khamenei, aka Ayatollah Ali Khamenei, Iranian Supreme Leader;
- 3. Iranian Ministry of Intelligence and Security (MOIS);
- 4. Iranian Revolutionary Guard Corp-Quds Force aka Qoods Division aka Jerusalem Force;
- 5. Iranian Revolutionary Guard Corp (IRGC);
- 6. Islamic Republic of Iran

7. Mohammed Baqer Zolqadr, Iranian Revolutionary Guards Corp. Deputy Commander Brig. Gen.

Each of these defendants are to be served at the Iranian Ministry of Foreign Affairs, United Nations Street; Tehran, Iran.

The Republic of Iraq is to be served by the State Department via the U.S. Embassy in Baghdad at the place and in the manner of their choosing.

Enclosed you will find two complete sets of documents for each defendant, one for service and one for the court's file. The documents include a complaint in English, and a translated complaint with verification in Farsi for the Iranian defendants and Arabic for the Iraqi defendant; Notice of Suit in English the respective official language, and a summons in English and the respective official language.

Also, please find enclosed two checks in the amount of \$735.00 each to cover the service fee to the respective U.S. Embassies.

Your assistance in expediting this request is greatly appreciated. If you have any questions or if additional materials or information are needed, please call either Jerry Goldman at 917-273-7658 or Fred Salek at 914-241-5579.

Sincerely,

Joshua M. Ambush